

EXHIBIT 16

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION
4 CHASOM BROWN,
5 Plaintiff, Case No.
6 vs.
7 GOOGLE LLC,
8 Defendant.
9 *****
10 CONFIDENTIAL
11 VOLUME II
12 CONTINUED ZOOM VIDEOTAPED DEPOSITION OF
13 JONATHAN HOCHMAN
14 July 21, 2022
15 10:09 a.m.
16 *****
17 TAKEN BY:
18 JOSEF ANSORGE, ESQ.
19 ATTORNEY FOR DEFENDANT
20 REPORTED BY:
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1 the data, they would have technologically 12:27:22
2 been able to do this. 12:27:25

3 Now, again, I'm not addressing 12:27:27
4 legal issues. I'm not addressing legal 12:27:29
5 restrictions or permissions. That's not 12:27:32
6 within the scope of my report. 12:27:35

7 Q. Mr. Hochman, in reaching the 12:27:42
8 conclusions that you're proffering in this 12:27:45
9 case, did you do any studies to see how 12:27:47
10 often devices are shared? 12:27:50

11 A. I have some general awareness of 12:27:55
12 the ratio between devices and users, and 12:27:58
13 I'm aware that there are something like 12:28:00
14 2.1 devices for every user. So it's 12:28:03
15 actually the case that devices share 12:28:06
16 users, not users share devices. So the 12:28:13
17 average user has more than one device on 12:28:16
18 average. 12:28:20

19 Q. Mr. Hochman, would you agree 12:28:24
20 that using fingerprinting to identify 12:28:25
21 individual users when they are in private 12:28:29
22 browsing mode and not logged in to an 12:28:34
23 account would violate their privacy? 12:28:37

24 MR. MAO: Objection to the form 12:28:41
25 of the question. 12:28:42

1 CERTIFICATION
2

3 I, BELLE VIVIENNE, a Nationally
4 Certified Realtime Reporter, do hereby
5 certify:

6 That the witness whose testimony as
7 herein set forth, was duly sworn by me;
8 and that the within transcript is a true
9 record of the testimony given by said
10 witness.

11 I further certify that I am not
12 related to any of the parties to this
13 action by blood or marriage, and that I am
14 in no way interested in the outcome of
15 this matter.

16 IN WITNESS WHEREOF, I have hereunto
17 set my hand this 26th day of July 2022.

18
19 *Belle Vivienne*

20 BELLE VIVIENNE, CRR, CCR, RPR
21

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